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February 8, 2019

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Via ECF

Hon. Joanna Seybert
United States District Court
Eastern District of New York
Long Island Federal Courthouse
100 Federal Plaza
P.O. Box 9014
Central Islip, New York 11722-9014

Re: Joseph Jackson v. Nassau County, et. al
Docket No.: 18-cv- 3007

Dear Judge Seybert:

Our office represents the Defendants, Incorporated Village of Freeport, the Village of Freeport Police Department and individual employees of the Village named as defendants in the above subject litigation. This correspondence is submitted as a letter motion requesting that the time for the parties to meet and confer for the purpose of limiting the claims and defendants in this litigation as well as the Village Defendants' time to produce discovery documents be extended to March 11, 2019. Furthermore, it is requested that the plaintiff's time to amend the caption be extended to March 18, 2019. The reason for this request is because Mr. Corbett has been out of the office for over a week due to a viral infection and it is unclear when he will be able to return. Additionally, we request additional time to review and discuss with our client voluminous documentation, which includes over 1,000 pages of documents before conferring with the parties and producing discovery.

Plaintiff's counsel has refused to consent to this request. Counsel for defendant Nassau County has expressed that her client consents to the above-mentioned request but contingent upon the additional request of this Court for an extension of the briefing schedule, namely extending the time by which motions to dismiss are to be submitted to May 7, 2019, with opposition to be submitted by June 6, 2019 and reply papers to be submitted by June 27, 2019. The Village Defendants consent to this extension.

As always, I appreciate the court's assistance in this matter. If the Court has any questions, please do not hesitate to contact the undersigned.

HARRIS BEACH PLLC
Attorneys for the Village Defendants

s/ Stephanie L. Tanzi
Stephanie L. Tanzi

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KMC/slt

cc: **VIA ECF**

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